

**ATTACHMENT A**

**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A SEARCH WARRANT**

I, Michael J. Barrett, being duly sworn, hereby depose and state as follows:

1. I am a Postal Inspector employed with the United States Postal Inspection Service (USPIS) since 2022. I am currently assigned to the Roanoke, VA domicile of the Washington Division. My responsibilities include the investigation of federal and state criminal violations involving the United States Postal Service (USPS) and crimes furthered through the use of the United States Mail. I am a “Federal law enforcement officer” within the meaning of Rule 41(a)(2)(C) of the Federal Rules of Criminal Procedure, that is, a federal law enforcement agent engaged in enforcing criminal laws and authorized to request a search warrant. I am authorized to investigate criminal and civil matters related to the United States Postal Service and the mails; serve warrants and subpoenas; make arrests; carry firearms; make seizures of property; administer oaths; and perform such other official duties as may be established by the Chief Postal Inspector.

2. Prior to becoming a United States Postal Inspector, I was a Police Officer with Fairfax County for four (4) years. I attended and completed a six (6) month academy, conducted at the Fairfax County Criminal Justice Academy. During my time as a police officer, I was trained in criminal investigations with regards to assaults, narcotics, violent crimes, as well as other law enforcement duties.

3. I know based on training and experience that the U.S. Mail is often used by drug trafficking organizations to transport controlled substances and proceeds from the sale of

controlled substances. I know based on training and experience that USPS Priority Mail and Priority Mail Express are commonly used to transport controlled substances, and drug trafficking proceeds, because drug traffickers can track parcels, control dispatch times and locations, and have a guarantee of delivery in one to three days.

#### **PROBABLE CAUSE**


4. On August 28, 2023, United States Postal Service Priority Mail parcel bearing tracking number “9505 5104 1756 3235 8286 49” was opened pursuant to Federal Search Warrant 7:23mj100. The search warrant led to the seizure of approximately 1055 grams of a white powder substance field tested positive as Cocaine. The parcel (hereafter referred to as Parcel #1) is described as follows:

- a. Addressee: James Tollier, 73 Burnt House Rd, Gladys, VA 24554
- b. Return Address: Angelina Tollier, 2420 E Beverly Dr, Tucson, AZ 85719
- c. Origin: Tucson, AZ 85726, Postage: \$17.10, Date August 23, 2023
- d. Tracking Number: 9505 5104 1756 3235 8286 49 (Parcel #1)
- e. Description: White USPS Priority Mail box bearing dimensions 11.25” x 8.75” x 6”
- f. Weight: 3 pound 8.00 ounces

5. Based on the contents of Parcel #1, which are suspected to be in violation of Title 21, United States Code, Sections 841(a)(1) and 843(b), your affiant is seeking a tracking warrant permitting law enforcement to:

- A. Monitor the signals emitted by a beeper device, which will be installed in Parcel #1 for the sole purpose of alerting law enforcement when the parcel is opened. This beeper may emit signals from within what would be considered a private area, and

- B. Monitor the signals emitted by a GPS tracking device to be installed in Parcel #1 that will indicate the location of the parcel. This GPS may emit signals from what would be considered private areas, including, but not limited to the subject location at 73 Burnt House Rd, Gladys, VA 24554.
- C. These two devices will not monitor voice conversations or provide any information other than the location of the parcel, and whether the parcel has been opened.

  
Michael J. Barrett  
Postal Inspector  
United States Postal Inspection Service

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by reliable electronic means; specifically, by telephone, on the 28th day of August, 2023.



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The Honorable Robert S. Ballou  
United States District Court Judge  
Western District of Virginia